

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**LEAD PLAINTIFFS' MOTION TO SEAL MEMORANDUM OF LAW AND EXHIBITS
IN SUPPORT OF THEIR MOTION TO COMPEL PRODUCTION OF DOCUMENTS
AND OPPOSING DEFENDANTS' REQUEST TO "CLAWBACK" NON-PRIVILEGED
DOCUMENTS**

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, respectfully move this Court for entry of an Order permitting Lead Plaintiffs to file under seal their Memorandum of Law and Exhibits in support of their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents ("Motion to Compel").

This Motion to Seal is made pursuant to Section 5.2 of the Stipulated Protective Order filed with this Court on June 25, 2015 (the "Protective Order"). The grounds for this Motion to Seal are set forth in the accompanying Memorandum, filed today. The documents and information supporting Lead Plaintiffs' Motion to Compel contain materials that Defendants have designated as Confidential Discovery Material. Pursuant to the Stipulated Protective Order, such materials shall be filed under seal as an initial matter.

DATED: October 29, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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